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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case, No.*
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO EIGHTEENTH THROUGH
TWENTY-FOURTH OMNIBUS
OBJECTIONS TO CLAIMS AND REQUEST
FOR ORDERS BY DEFAULT AS TO
UNOPPOSED OBJECTIONS**

[Re: Dkt. Nos. 9263, 9266, 9269, 9272, 9275,
9278, 9281]

**Resolving Objections Set for Hearing
November 17, 2020 at 10:00 a.m. (Pacific Time)**

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9276, and 9279], and, in the case of the Twenty-Fourth Omnibus Objection, the declaration of David Kraska [Docket No. 9282]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Andrew G. Vignali*, filed on October 19, 2020 [Docket No. 9320] (the “**Certificate of Service**”). As further described in the Certificate of Service, on October 9, 2020, each Proof of Claim listed on Exhibit 1 to the Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and/or expunged, and (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
Eighteenth Omnibus Objection			
Informal	Rosemount, Inc.	2718 10085	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant’s response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
9351	Asplundh Construction, LLC	7976 17001	Claimant does not oppose disallowance of its Claim as set forth in the <i>Statement of Non-Opposition and Reservation of Rights re Reorganized Debtors’ Eighteenth Omnibus Objection to Claims</i> [Docket No. 9351].
Informal	TRC Master Fund LLC as transferee of B&B Plumbing & Construction Inc.	2733	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.
Informal	TRC Master Fund LLC as transferee of B&B Plumbing & Construction Inc.	16919	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.
Informal	VonWin Capital Management, L.P. as transferee of Craig Communications Inc.	1743	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.

Docket No.	Claimant	Claim No.	Resolution
Informal	Citigroup Financial Products Inc.	75045	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.
Informal	Citigroup Financial Products Inc. as transferee of Phillips and Jordan, Incorporated	3447	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.
Informal	Marble Ridge TC LP as Transferee of Marble Ridge Master Fund LP	64138	The Reorganized Debtors have reached a settlement of this Claim that moots the Eighteenth Omnibus Objection.
Nineteenth Omnibus Objection			
Informal	Angela Rodgers	31029 56866	The Nineteenth Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	SPCP Group, LLC	3255 27374	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
9340	Edgar Perry	92615 106158	<p>The Reorganized Debtors' counsel spoke to Claimant by telephone on November 10, 2020, and attempted to explain that the Reorganized Debtors only were seeking to disallow and expunge one of his claims, Claim No. 92615, and that Claim No. 106158 would remain on the claims register subject to further objection. Claimant requested this message be conveyed by United States Mail, which the Reorganized Debtors' counsel did on November 12.</p> <p>If necessary, the Reorganized Debtors are prepared to address the Nineteenth Omnibus Objection with respect to this Claim at the hearing.</p>

Docket No.	Claimant	Claim No.	Resolution
Informal	Burney Forest Products	53844	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Informal	Ernie & Sons Scaffolding Inc.	6967	The Reorganized Debtors have reached a settlement of this Claim that moots the Nineteenth Omnibus Objection.
Twentieth Omnibus Objection			
Informal	Bestwall, LLC	65587 65524	The Twentieth Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	State Farm General Insurance Company	58088 58302	By agreement with Claimant, Claim No. 58088 shall be disallowed and expunged, and Claim No. 58302 shall survive.
Informal	Monica Staar	86862 86898	<p>The Reorganized Debtors' counsel emailed Claimant on November 9, 2020, and explained that the Reorganized Debtors are only objecting to one of her claims, Claim No. 86862, asserted against PG&E Corporation. That claim is substantively identical to Claim No. 86898, asserted against Pacific Gas and Electric Company. The Reorganized Debtors have not yet received a response.</p> <p>If necessary, the Reorganized Debtors are prepared to address the Twentieth Omnibus Objection with respect to this Claim at the hearing.</p>
Informal	Gowan Construction Company, Inc.	64156	The Reorganized Debtors have reached a settlement of this Claim that moots the Twentieth Omnibus Objection.
Informal	Vedder Price P.C.	1227	The Reorganized Debtors have reached a settlement of this Claim that moots the Twentieth Omnibus Objection.

Docket No.	Claimant	Claim No.	Resolution
Twenty-First Omnibus Objection			
Informal	Asplundh Construction, LLC	17001	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Informal	Sierra Pacific Industries	2377	The Claimant has confirmed to the Reorganized Debtors that Claim No. 2377 has been satisfied in its entirety. Accordingly, it will be expunged.
Informal	W. Bradley Electric, Inc.	67191	The Reorganized Debtors have reached a settlement of this Claim that moots the Twenty-First Omnibus Objection.
Informal	Aramark Refreshment Services, LLC	3582	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Informal	McMaster-Car Supply Co.	2362	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Informal	Burney Forest Products	2255	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.

Docket No.	Claimant	Claim No.	Resolution
Informal	Southwest Research Institute	1787	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Informal	Burns & McDonnell Engineering Company, Inc.	76752	The Reorganized Debtors have reached a settlement of this Claim that moots the Twenty-First Omnibus Objection.
Informal	Airgas Specialty Products	2175	The Reorganized Debtors have reached a settlement of this Claim that moots the Twenty-First Omnibus Objection.
Twenty-Second Omnibus Objection			
Informal	CA BTM Energy Storage, LLC	30941	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 29, 2020. If the objection cannot be resolved, it will be continued to the omnibus hearing, on January 12, 2021, at 10:00 a.m.
Informal	CA Energy Storage Holdings, LLC	30944	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 29, 2020. If the objection cannot be resolved, it will be continued to the omnibus hearing, on January 12, 2021, at 10:00 a.m.
Informal	GSA Solar, LLC	31024	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 29, 2020. If the objection cannot be resolved, it will be continued to the omnibus hearing, on January 12, 2021, at 10:00 a.m.
Informal	Global Ampersand LLC	27367	The Reorganized Debtors are attempting to resolve this matter

Docket No.	Claimant	Claim No.	Resolution
			consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Informal	Panoramic Investments	1932	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 1, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on December 15, 2020, at 10:00 a.m.
Twenty-Third Omnibus Objection			
Informal	Phillips 66 Pipeline LLC	97934	Following consultation with the Claimant, the Reorganized Debtors agreed to revise the proposed order granting the Twenty-Third Omnibus Objection to include the additional language in para. 2 that references MLX Claims.
9352	Asplundh Construction, LLC	97049	Claimant contends that Claim No. 97049 is a Fire Victim Claim as defined in the Plan. Claim No. 97049 thus shall for all purposes be treated and classified as a Fire Victim Claim under the Plan, and shall be fully assumed by, and the sole responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be administered, processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in accordance with the Fire Victim Trust Agreement and the Fire Victim Claims Resolution Procedures. Claimant shall have no further recourse against the Debtors or Reorganized Debtors, as applicable, with respect to Claim No. 97049 or the Fire Victim Claim asserted therein.
9353	Utility Tree Service, LLC	97051	Claimant contends that Claim No. 97051 is a Fire Victim Claim as

Docket No.	Claimant	Claim No.	Resolution
			defined in the Plan. Claim No. 97051 thus shall for all purposes be treated and classified as a Fire Victim Claim under the Plan, and shall be fully assumed by, and the sole responsibility of, the Fire Victim Trust and subject to the Channeling Injunction, to be administered, processed, settled, disallowed, resolved, liquidated, satisfied, and/or paid in accordance with the Fire Victim Trust Agreement and the Fire Victim Claims Resolution Procedures. Claimant shall have no further recourse against the Debtors or Reorganized Debtors, as applicable, with respect to Claim No. 97051 or the Fire Victim Claim asserted therein.
Twenty-Fourth Omnibus Objection			
Informal	California State Agencies		Following consultation with the Claimant, the Reorganized Debtors agreed to revise the proposed order granting the Twenty-Fourth Omnibus Objection to include the additional language in paragraph 2 that references the Plan's treatment of Environmental Claims and Environmental Performance Obligations.
Informal	Federal Agencies		Following consultation with the Claimant, the Reorganized Debtors agreed to revise the proposed order granting the Twenty-Fourth Omnibus Objection to include the additional language in paragraph 2 that references the Plan's treatment of Environmental Claims and Environmental Performance Obligations.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors

1 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no
2 responses have been filed with respect to the Omnibus Objections except as described herein.

3 3. This declaration was executed in San Francisco, California.

4 WHEREFORE, the Reorganized Debtors hereby request entry of Orders disallowing and
5 expunging the Proofs of Claims listed in the column headed "Claims to be Disallowed and Expunged"
6 in **Exhibit 1** to this Request, which listed Claims are identical to those listed in Exhibit 1 to the
7 Omnibus Objections, except as otherwise discussed above.

8 Dated: November 13, 2020

KELLER BENVENUTTI KIM LLP

9 By: /s/ Dara L. Silveira
10 Dara L. Silveira

11 *Attorneys for Debtors and Reorganized Debtors*
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